

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

RENADO EDWARDS Plaintiff,)	JURY TRIAL DEMANDED
)	
)	
v.)	Case No. CIV-23-713-D
)	
LVNV FUNDING LLC.,)	
Defendant.)	
)	
)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff Renado Edwards, an individual consumer, against Defendant, LVNV Funding, LLC., (“LVNV”) for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair debt collection practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) and 28 U.S.C § 1331. Venue in this District is proper in that the Defendant transacts business in

Oklahoma City, Oklahoma County, Oklahoma, and the conduct complained of occurred in Oklahoma City, Oklahoma County, Oklahoma.

III. PARTIES

3. Plaintiff is a natural person residing in Oklahoma City, Oklahoma County, Oklahoma. Plaintiff is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
4. Upon information and belief, Defendant is a Delaware corporation with its registered agent for service of process as Corporation Service Company, 10300 Greenbriar Place, Oklahoma City, OK 73159.
5. Defendant is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempt to collect consumers' debts alleged to be due to another.

IV. FACTS OF THE COMPLAINT

6. Defendant is a "debt collector" as defined by the FDCPA, 15 U.S.C § 1692a(6).
7. On or about June 6, 2023, Plaintiff reviewed his credit report on "credit karma."
8. On the report, Plaintiff observed a trade line from Defendant.
9. Defendant furnished a trade line of \$824, allegedly owed to Credit One Bank.
10. On June 6, 2023, Plaintiff made a dispute via telephone, however on August 11, 2023 Plaintiff re-checked his credit reports and observed that Defendant failed to communicate that the debt was disputed by Plaintiff.

11. Defendant's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Plaintiff and caused severe humiliation, and emotional distress and mental anguish.

**V. FIRST CLAIM FOR RELIEF
15 U.S.C. §1692e(8)**

12. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
13. Defendant violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies that alleged debt was in dispute by Plaintiff.
14. As a result of the above violations of the FDCPA, the Defendant is liable to Plaintiff for actual damages, statutory damages and costs.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against Defendant for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C § 1692k(1)(2);
- C. Statutory damages pursuant to 15 U.S.C § 1692k(2);
- D. Cost and reasonable attorney's fees pursuant to 15 U.S.C § 1692k(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

Dated: August 11, 2023

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